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7 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS
CARDIFF,

15 Defendant.
16
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Case No. 5:23-CR-00021-JGB

**UNOPPOSED *EX PARTE*
APPLICATION TO EXTEND PAGE
LIMITATION FOR DEFENDANT
JASON CARDIFF'S MOTION TO
DISMISS INDICTMENT WITH
PREJUDICE; DECLARATION OF
STEPHEN G. LARSON**

*[Filed concurrently with [Proposed]
Order]*

**EX PARTE APPLICATION TO EXTEND PAGE
LIMIT WITH RESPECT TO DEFENDANT'S MOTION TO DISMISS
INDICTMENT WITH PREJUDICE**

**I. CONTACT INFORMATION FOR OPPOSING COUNSEL PURSUANT
TO C.D. CAL LOCAL RULE 7-19**

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II. APPLICATION

The Motion to Dismiss Indictment with Prejudice is predicated on nearly six years of ongoing communication, coordination, and information sharing among the Federal Trade Commission, United States Postal Inspection Service, a court-appointed Receiver, his counsel, Department of Justice, and United States Attorney's Office. In order to adequately document this history, it was necessary to include a comprehensive chronology of events in the Statement of Facts. Though presented in streamlined bullet points, the chronology itself is 19.5 pages.

Following the Statements of Facts, the Defense raises multiple constitutional challenges based on the history detailed in the chronology. In doing so, the Defense worked to efficiently present each argument while providing the necessary citations

1 to assist the Court. In total, the Defense was able to reduce its Argument Section to
2 16 pages. Nonetheless, the Memorandum of Points and Authorities totals 39 pages.

3 Accordingly, the undersigned respectfully requests that the 25-page limit for
4 memoranda of points and authorities be extended to 39 pages for Defendant Jason
5 Cardiff's Motion to Dismiss Indictment with Prejudice.

6 On April 1, 2024, the Government advised by email that it does not oppose
7 this request.

8
9 Dated: April 8, 2024

LARSON LLP

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12 By: /s/ Stephen G. Larson

13 Stephen G. Larson

14 Hilary Potashner

Jonathan Gershon

15 Attorneys for Defendant

16 JASON EDWARD THOMAS CARDIFF
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DECLARATION OF STEPHEN G. LARSON

I, Stephen G. Larson, hereby declare and state as follows:

1. I am a partner at Larson LLP, attorneys of record for Defendant Jason Cardiff. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to the matters stated herein.

2. Pursuant to L.R. 7-19, I submit this declaration in support of the Defendant's Unopposed *Ex Parte* Application to Extend Page Limitation for Defendant Jason Cardiff's Motion to Dismiss Indictment with Prejudice.

3. On April 1, 2024, the Government advised by email that it does not oppose the granting of this request.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 8th day of April, 2024, at Los Angeles, California.

/s/ Stephen G. Larson
Stephen G. Larson